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February 20, 2013

MEMO ENDORSED

BY FACSIMILE [212-805-7900]

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Hasanoff,
S7 10 Cr. 162(KMW)

Dear Judge Wood:

This letter is submitted in regard to an adjournment of the sentencing and sentencing submission dates in the above-entitled case, in which David A. Ruhnke, Esq., Linda Moreno, Esq., and I represent defendant Sabirhan Hasanoff. Mr. Hasanoff's sentencing is currently scheduled for March 25, 2013, at 10:30 a.m., and his sentencing submission is due February 25, 2013. It is respectfully requested that Mr. Hasanoff's sentencing and sentencing submission due date, respectively, be adjourned by approximately one month to provide defense counsel with additional time to respond to the newly declassified materials provided by the government to defense counsel in mid-January. Assistant United States Attorney Glen Kopp has informed my associate, Lindsay A. Lewis, Esq., that the government does not object to this request.

Additional time to respond to the declassified filing and a one month adjournment of the sentencing and sentencing submission dates are necessary because (1) as set forth in our previous letter to the Court on this issue, the declassified filing is material to our sentencing submission and we must go back to the Secure Compartmentalized Information Facility to determine whether to compose a classified filing in order to put the declassified material in context; (2) the declassified materials were disclosed to defense counsel at approximately the same time that all counsel with security clearances commenced trial out-of-state; and (3) all members of Mr.

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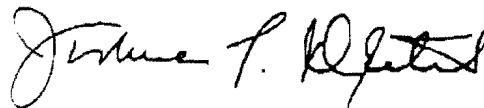
Hasanoff's defense team with security clearances are still engaged in trial in either *United States v. Basaaly Moalin*, 10 Cr. 4246 (JM), in San Diego, or *United States v. Alexis Cadelario-Santana*, 09 Cr. 427 (JAF), in Puerto Rico. Thus, counsel has not yet had the opportunity to prepare its response to the declassified materials.

In addition, I am set to begin trial April 1, 2013, before the Honorable Sidney H. Stein, in *United States v. Mondher Bejaoui*, 10 Cr. 553. Therefore a new sentencing date in even early to mid- April could potentially conflict with this trial.

Accordingly, it is respectfully requested that this Court adjourn Mr. Hasanoff's sentencing until late April, at a date and time convenient to the Court, with sentencing submissions to be filed in late March. As set forth above, the government does not object to this request.

Sentencing is adjourned to April 30, 2013,
at 11:00 a.m. Defendant's submission
is due March 26. Government
response is due April 9.

Respectfully submitted,

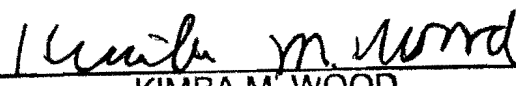


Joshua L. Dratel

JLD/lal

cc: AUSA John Cronan (by e-mail)
AUSA Aimee Hector (by e-mail)
AUSA Glen Kopp (by e-mail)

2-20-13
SO ORDERED: N.Y., N.Y.



KIMBA M. WOOD
U.S.D.J.